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and James Dondero*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.

Debtor.

Chapter 11

Case No. 19-34054 (SGJ)

**STIPULATION TO EXTEND HIGHLAND CLO MANAGEMENT, LTD.'S AND JAMES  
DONDERO'S RESPONSE DEADLINE WITH RESPECT TO  
HIGHLAND CAPITAL MANAGEMENT, L.P.'S MOTION FOR  
(A) A BAD FAITH FINDING AND (B) AN AWARD OF ATTORNEYS' FEES  
AGAINST HIGHLAND CLO MANAGEMENT, LTD. AND JAMES DONDERO IN  
CONNECTION WITH HCLOM CLAIMS 3.65 AND 3.66**

This stipulation (the “Stipulation”) is made and entered into in the above-captioned bankruptcy proceeding by and among Highland CLO Management, LTD. (“HCLOM”), James Dondero (“Dondero”), and Highland Capital Management, L.P. (“Highland”), the reorganized debtor in the above-referenced bankruptcy (together, the “Parties”), by and through their respective undersigned counsel and subject to Court approval. The Parties respectfully state and stipulate as follows:

IT IS HEREBY JOINTLY STIPULATED AND AGREED as follows:

1. HCLOM's and Dondero's deadline to serve and file a substantive objection to *Highland Capital Management, L.P.'s Motion for (A) a Bad Faith Finding and (B) an Award of Attorneys' Fees Against Highland CLO Management, Ltd. and James Dondero in Connection with HCLOM Claims 3.65 and 3.66* [Dkt 4176] (the "Motion") is extended from December 12, 2024, to December 16, 2024.
2. If the Court requests further briefing on the Motion following the December 18, 2024 hearing, the Parties shall simultaneously file supplemental briefs by 5:00 p.m. Central Time on January 17, 2025 (no further briefing shall be permitted without leave of court upon a showing of good cause).
3. This Stipulation may be executed in counterparts. A facsimile, electronic, or photocopy of this Stipulation and the signatures hereto shall have the same effect and may be accepted with the same authority as if it were an original.

Dated: December 9, 2024

CONSENTED AND AGREED TO BY:

/s/ Deborah Deitsch-Perez

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